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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 25 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

)
Amendment of the Commission's)
Rules to Establish Part 27,)
the Wireless Communications)
Service ("WCS"))

GN Docket No. 96-228

To: The Commission

REPLY OF 21st CENTURY TELESIS, INC. TO OPPOSITIONS TO
PETITION FOR EXPEDITED CONSIDERATION

21st Century Telesis, Inc. ("21st Century"), by counsel, hereby respectfully submits this Reply to Oppositions to Petition for Expedited Consideration. 21st Century respectfully submits that the limitations on interference set forth by the Order¹ in this docket are supported by record evidence submitted to the Commission. In support thereof, the following is shown:

On March 11, 1997, PACS Providers Forum and DigiVox Corporation filed jointly a Petition for Expedited Reconsideration, arguing that the out-of-band emission limits for WCS are unnecessarily restrictive.² Petitioners suggested that less burdensome restrictions are compatible with SDARS operations, and are necessary in order to provide a critical mix of new competitive services. 21st Century disputes both assertions.

The Commission considered adequately the record before it when adopting the Order, and the limits imposed by the Order are

^{1/} In the Matter of Amendment of the Commission's Rules to Establish Part 27, the Wireless Communications Service: Report and Order, GN Docket No. 96-228 (rel. Feb. 19, 1997).

^{2/} In the Matter of Amendment of the Commission Rules to Establish Part 27, the Wireless Communications Service ("WCS"): Petition for Expedited Reconsideration of PACS Providers Forum and DigiVox Corporation, GN Docket No. 96-228 (Mar. 11, 1997).

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supported by record evidence. The technical limitations that operate to disallow PACS on this frequency are a reasoned response to data that indicates that PACS will interfere with SDARS services. As noted by Primosphere Limited Partnership in its Opposition to the Petition for Expedited Reconsideration, the technical information submitted by the Petitioners does not support a reversal of Commission policy.³ By contrast, the evidence relied upon the Commission in the Order supports the protection from interference accorded to SDARS.

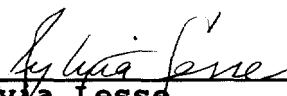
21st Century will itself be providing competitive local loop services on a wireless basis. 21st Century is currently deploying PACS technology to provide such services utilizing the PCS C-block band.

Accordingly, and for the foregoing reasons, 21st Century respectfully urges the Commission to deny the Petition for Expedited Reconsideration.

Respectfully submitted,

21st Century Telesis, Inc.

By:


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DATED: March 25, 1997

^{3/} In the Matter of Amendment of the Commission's Rules to Establish Part 27, the Wireless Telecommunications Service: Opposition to Petition for Expedited Reconsideration of Primosphere Limited Partnership, GN Docket No. 96-228, at pp. 4-7 (Mar. 21, 1997).

CERTIFICATE OF SERVICE

I, Shelley M. Bryce, of Kraskin & Lesse, 2120 L Street, NW, Suite 520, Washington, DC 20037, hereby certify that a copy of the foregoing "Reply to Oppositions to Petition for Expedited Reconsideration" was served on this 25th day of March 1997, by hand delivery, to the following parties:


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